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October 1, 1999

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VIA FACSIMILE & REGULAR MAIL

Mr. Michael McAteer
U.S. EPA – Region 5
77 West Jackson Blvd. (SR-6J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I – January 21, 1999 Administrative Order by Consent
October 1, 1999 Update re Access Agreements**

Dear Mike:

In Solutia Inc.'s ("Solutia") September 17, 1999, access update to U.S. EPA, Solutia requested that U.S. EPA grant it a final extension on its "Obtain Access Agreements" schedule to October 1, 1999. This letter constitutes Solutia's October 1, 1999, report to U.S. EPA on access. Although Solutia had hoped to have obtained access to all the properties involved in the EE/CA and RI/FS by this date, Solutia has not yet secured all the required access agreements. Since the submission of our last access update, Solutia has reached agreements with the Village of Sauget and David Thomas (Site N).

Solutia has been unable to finalize an agreement with the Rogers Cartage Company ("Rogers Cartage"). Solutia originally received a signed agreement from Rogers Cartage on Tuesday, September 28, 1999, and has already taken a groundwater elevation sample of Well EE-04. Solutia has also been in contact with Rogers Cartage in order to schedule the other required sampling activities. Today, October 1, 1999, Rogers Cartage notified Solutia that it was revoking Solutia's license to access the property, and that it will not permit Solutia to conduct any of the scheduled HydroPunching™. We are currently in the process of trying to negotiate with Rogers Cartage, but we may require EPA's assistance to complete these negotiations.

Solutia may also be requesting EPA's assistance with respect to the Berry Black access agreement. Berry Black's attorney, Frank Hackmann, contacted Thompson Coburn on

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September 23, 1999, and promised that a slightly revised access agreement would be forwarded to the firm the following Monday, September 27, 1999. I received the revised agreement on September 30, 1999. Solutia then forwarded another agreement to Mr. Hackmann that day for his consideration. Although Mr. Hackmann appeared to be agreeable to the changes, he noted that the earliest he could get a signed agreement to us was by mid-next week. Solutia has already had to revise the sampling schedule in order to work around the lack of access to Site N. Solutia has not been able to perform the scheduled sampling activities in their original sequence, which has already resulted in delays in the schedule. Solutia will continue to press Mr. Black's attorney for access, but further assistance from EPA may be required in order to accelerate the process.

The only other remaining access issues are those that have arisen during the course of implementing the sampling plan. The following three new areas requiring access were identified during the weeks of September 14 and September 21: (1) property east of the levee between Cargill Rd. and Levin Dr.; (2) property along the old Prairie Du Pont Creek in East Carondelet, Illinois; and (3) property along Taake Rd., east of the levee. Solutia has already obtained a signed agreement from the Prairie Du Pont Levee and Sanitation District for the property near the old Prairie Du Pont Creek. Solutia is currently investigating the ownership of the other two areas, but is having difficulty identifying the owners. Unfortunately, this may cause delays in the sampling plan as early as next week.

Solutia is not at this time requesting a formal extension of the "Obtain Access Schedule." However, Solutia will continue to work on access issues as they arise, and will continue to keep EPA informed of its progress. At this point, any delay in access is having an impact on the schedule. Again, Solutia may be requesting U.S. EPA's assistance in the near future with regard to the above-listed access issues.

If you have any questions, please call me at the above number.

Very truly yours,

Thompson Coburn LLP

By 
Colleen E. Michuda

CEM/gao

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cc: Thomas J. Martin, Esq.
Mr. D. Michael Light
Joseph G. Nassif, Esq.